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TRAFFICSCHOOL.COM, INC. and

8 DRIVERS ED DIRECT, LLC

9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA**

11
12 TRAFFICSCHOOL.COM, INC., a
13 California corporation; DRIVERS ED
14 DIRECT, LLC, a California limited
liability company,

15 Plaintiffs,

16 vs.

17 EDRIVER, INC., ONLINE GURU,
18 INC., FIND MY SPECIALIST, INC.,
and SERIOUSNET, INC., California
19 corporations; RAVI K. LAHOTI, RAJ
LAHOTI, individuals,

20 Defendants.

CASE NO. CV 06-7561 PA (CWx)
The Hon. Percy Anderson

**PLAINTIFFS' REPLY TO
DEFENDANTS' EVIDENTIARY
OBJECTIONS TO AND MOTION TO
STRIKE PORTIONS OF THE
DECLARATIONS SUBMITTED IN
SUPPORT OF PLAINTIFFS'
MOTION FOR ATTORNEY FEES
AND COSTS**

Date: December 5, 2011

Time: 1:30 p.m.

Crtrm.: 15

Complaint Filed: November 28, 2006

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28 4850-8470-8110.1

**PLAINTIFFS' REPLY TO DEFENDANTS' EVIDENTIARY OBJECTIONS TO DECLARATIONS IN SUPPORT
OF MOTION FOR FEES AND COSTS**

Defendants' evidentiary objections are without merit as follows:

- The evidence presented by Ms. Hamilton's Declaration was soundly presented for each statement, representation, admission by Defendants' counsel, and exhibits attached to Ms. Hamilton's Declaration;
- The evidence goes to the core points at issue in the fee motion; and
- To the extent that that Defendants offer of some sort of alternative evidence (attached to Lahoti's Declaration or otherwise states that the Court can review the current website), that evidence is not what the Best Evidence Rule is directed to and is misperceived by Defendants (F.R.E., Rules 1002-1004). Offering alternative evidence, as done by Lahoti, is not what this evidentiary rule addresses.
- See also, Supplemental Declarations of Mina I. Hamilton and Josephine Brosas, and exhibits attached thereto.

DATED: November 21, 2011

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Mina I. Hamilton

Mina I. Hamilton

Attorneys for Plaintiffs

TRAFFICSCHOOL.COM, INC. and
DRIVERS ED DIRECT, LLC